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17 Attorneys for Defendant  
18 NATIONWIDE INSURANCE COMPANY OF AMERICA

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28 **UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JOSEPH RAMON, individually

Plaintiff,

v

NATIONWIDE INSURANCE COMPANY  
OF AMERICA; DOES 1 through 20; ROE  
BUSINESS ENTITIES 1 through 20,  
inclusive jointly and severally,

Defendants.

**Case No.: 2:22-cv-01618-GMN-EJY**

**STIPULATION AND [PROPOSED]  
ORDER TO DISMISS ACTION WITH  
PREJUDICE AND WITHDRAWAL OF  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT [ECF NO. 16]**

TO THE U.S. DISTRICT COURT FOR THE DISTRICT OF NEVADA, ALL  
PARTIES, AND THEIR ATTORNEYS OF RECORD:

Plaintiff Joseph Ramon ("Plaintiff") and Defendant Nationwide Insurance

1 Company of America (“NICOA”), by and through their attorneys of record, having  
2 entered into a written confidential settlement agreement, and pursuant to *Federal Rules of  
3 Civil Procedure* 41(a), hereby stipulate and agree to dismiss the above-referenced action  
4 in its entirety, with prejudice.

5 Defendant also requests that its Motion for Summary Judgment filed on March 17,  
6 2023 [ECF Document No. 16] be withdrawn and that no ruling or order be issued in  
7 relation to it.

8 The parties have agreed that each side shall bear its own costs and fees.  
9

10 Dated: July 19, 2023

**RICHARD HARRIS LAW FIRM**

12 By: /s/ Samantha A. Harris  
13 Samantha A. Harris  
14 *Attorneys for Plaintiff*

15 Dated: July 19, 2023

**HINES HAMPTON PELANDA, LLP**

17 By: /s/ Nicole M. Hampton  
18 Nicole M. Hampton  
19 *Attorneys for Defendant*

20 **ATTESTATION OF CONCURRENCE IN FILING**

21 I hereby attest and certify that on July 19, 2023, I received concurrence from  
22 Plaintiff’s counsel, Samantha A. Harris, to file this document with his electronic  
23 signature attached.

24 I certify under penalty of perjury under the laws of the United States of America  
25 that the foregoing is true and correct. Executed on July 19, 2023.

26 /s/ Nicole M. Hampton  
27 Nicole M. Hampton

## ORDER

Based on the parties' stipulation herein, and good cause appearing,

**IT IS HEREBY ORDERED** that this action shall be and hereby is dismissed in its entirety, with prejudice, with each side to bear its own fees and costs, and Defendant's Motion for Summary Judgment [ECF Document No. 16] is hereby **WITHDRAWN**.

The Clerk of Court is directed to CLOSE THIS CASE. *[Signature]*

## **U.S. District Judge Gloria M. Navarro**

Dated: July 19, 2023